

**THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civ. Action No. 19-cv-08655(LGS)(GWG)

DECLARATION OF ULKU ROWE

I, Ulku Rowe, hereby declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I have a Bachelor's degree in Computer Engineering and a Master's degree in Computer Science from the University of Illinois at Urbana Champaign, where I was a Fulbright Scholar. Both of these degrees are considered computer engineering degrees.

2. I have 26 years of experience related to computer engineering, including, but not limited to, managing and directing the innovation, engineering, production, and development of computer software, databases, and other tools, primarily for clients in the financial services industry.

3. Based on my education and relevant experience, I consider myself to be a computer engineer.

4. In March 2017, Defendant ("Google") hired me as a Technical Director in the Office of the CTO ("OCTO") (hereinafter "Technical Director").

5. Before interviewing for the Technical Director role, I interviewed for a Software Engineering ("SWE") Director role.

6. After interviewing for the SWE role, the recruiter contacted me with an opportunity to pursue what she described as a similar role within Google's engineering team, which is commonly referred to as "Eng." The role to which she was referring was the Technical Director role in OCTO.

7. During my interview for an Eng role in OCTO, I was interviewed by a panel of Directors in various roles across Google, including but not limited to, SWEs.

8. In my experience, based on my knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, Eng roles at Google are focused on building software or hardware and are distinct from other groups such as Sales, Marketing, Communications, Finance, Legal, HR, or Real Estate.

9. The Technical Director role that I and other male Technical Directors held is scoped as a Level 8 through Level 9 role, like other Eng Director roles.

10. The Technical Director role is an Eng role and is commonly referred to as an "Eng Director" role by me, other individuals employed in the Technical Director position, and the larger Engineering division of Google.

11. Upon hire, I was leveled as a Level 8 by Google, although I performed the same duties and responsibilities as Technical Directors at Level 9.

12. The Technical Director role consists of three categories of job responsibilities, often referred to as "pillars": 1) customer and client engagement; 2) strategic product development and engineering of Google products; and 3) thought leadership, partnership building, and evangelism.

13. The customer and client engagement pillar involves working directly with clients to understand underlying business needs of an external customer and identifying solutions through implementation of Google technology.

14. The strategic product development and engineering pillar involves Technical Directors working with engineering teams to discuss and strategize about Google Cloud's technical product and strategy direction.

15. The evangelism, partnership building, and thought leadership component requires Technical Directors to speak publicly around the world about Google technology.

16. Based on my personal experience and as outlined by my supervisor, Will Grannis, these three pillars are key components of the job responsibilities performed by Technical Directors employed by Google.

17. Google did not distinguish between Directors in Eng, who were often grouped together in email listserves or distribution groups, Eng committees, and Eng-events, such as the Technical Leadership summit.

18. In my experience as a recurring host of the Google Technical Immersion Program welcome session, all Eng employees, including those in OCTO, were onboarded through the same three-week technical training.

19. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, Eng refers to roles held within OCTO, SWE, Product Management ("PM"), Application Engineering ("AE"), and other technical roles within Google Cloud.

20. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, individuals employed by Google

in Eng Director roles share common job responsibilities and skill sets which allow for internal mobility and easy movement across job ladders.

21. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, Google requires Eng Directors to have a similar technical skill set with technical degrees, regardless of the specific role they will hold at Google.

22. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, Eng Directors undergo the same hiring process, promotion process, and are subject to the same performance evaluation standards, regardless of the specific role they will hold at Google.

23. In my experience, the Eng Director processes and standards are distinctly different than the processes and standards applied to non-Eng roles like Sales, Marketing, HR, and other roles.

24. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, Eng Directors share the following common skills, duties, and responsibilities:

- a. Deep technical engineering expertise and acumen, involving software engineering design and architecture at scale, use and knowledge of algorithms, data structures, storage, networking, security, and privacy reliability, among other competencies;
- b. Ability to individually contribute to and/or manage projects;
- c. Understanding of Google's engineering capabilities and products;
- d. Ability to understand clients' and industries' technical requirements and translate that into product design and delivery;


- e. Ability to collaborate with internal and external stakeholders to solve complex technical problems and drive change;
- f. Ability to come up with innovative solutions and products with significant impact;
- g. Ability to set business strategy; and
- h. Credibility in technology and/or industry.

25. In my experience, based on knowledge, interactions, and observation over the nearly four years that I have been employed in Google Cloud, all Eng Directors serve similar functions. For example, Technical Directors, PM Directors, and SWE Directors serve as technical leaders on internal and client projects, advising engineering teams on architecture, product design, and software development, which requires Directors in Eng roles to:

- a. have a deep understanding of Google's products, including but not limited to databases, networking, and storage;
- b. collaborate with internal and external stakeholders to solve technical problems and translate that to product design and delivery; and
- c. develop innovative solutions and products, and set business strategy.

Dated: January 15, 2021
New York, New York

Respectfully submitted,

DocuSigned by:

By: E72E69E02D42431
Ulku Rowe